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FILED IN THE  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

**2:15-CR-8-WFN**

INDICTMENT

UNITED STATES OF AMERICA,  
Plaintiff,

vs.

ANTHONY DANIEL RAMIL,  
GERALD W. TARMAN,  
TERESA LOUISE ALLEN  
(AKA-TERESA GARCIA), and  
BRIENNA ELAINE ALLEN,  
Defendants.

Vio: 18 U.S.C. § 371  
Conspiracy to  
Manufacture and Pass  
Counterfeit Currency  
(Count 1)

Vio: 18 U.S.C. § 472  
Passing Counterfeit  
Currency  
(Counts 2-5)

Vio: 18 U.S.C. § 471  
Manufacture of  
Counterfeit Currency  
(Count 6)

Notice of Criminal  
Forfeiture Allegations

The Grand Jury charges that:

**COUNT 1**

That beginning an exact date unknown, but no later than or about May 21, 2013, and continuing until on or about July 12, 2013, in the Eastern District of Washington, the Defendants, ANTHONY DANIEL RAMIL, GERALD W. TARMAN, TERESA LOUISE ALLEN, and BRIENNA ELAINE ALLEN, and others both known and unknown to the Grand Jury, did unlawfully and knowingly combine, conspire,

INDICTMENT - 1

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1 confederate and agree among themselves and each other to commit certain offenses  
2 against the United States, to wit: the manufacture and passing of counterfeit obligations  
3 of the United States, that is, Federal Reserve Notes, which they knew to be falsely made,  
4 forged, and counterfeited, in violation of 18 U.S.C. §§ 471 and 472, and in furtherance of  
5 this conspiracy did commit overt steps, as set forth in this Indictment, all in violation of  
6 18 U.S.C. § 371.

### 7 MANNER AND MEANS

8 The Defendants ANTHONY DANIEL RAMIL, GERALD W. TARMAN,  
9 TERESA LOUISE ALLEN, and BRIENNA ELAINE ALLEN, did use printers, laptop  
10 computers, paper trimmers, and Federal Reserve Note back plates, to manufacture  
11 counterfeit Federal Reserve Notes in \$20 denominations, bearing the serial numbers:  
12 IJ76840885A, IG79572673C, IB35993511B, JA76941548A, IF05286193A,  
13 JB85311121C, IF79356791H, ID06588228D, IA57580177A, and JL69678393C, and did  
14 later pass and attempt to these counterfeit Federal Reserve Notes in order to achieve the  
15 object of the conspiracy, which was to acquire products in exchange for the counterfeit  
16 currency and genuine currency as change once the counterfeit currency was passed.

### 17 OVERT ACTS

18 In furtherance of the Conspiracy, as charged in Count 1, and to achieve the objects  
19 thereof, the Defendants, ANTHONY DANIEL RAMIL, GERALD W. TARMAN,  
20 TERESA LOUISE ALLEN, AND BRIENNA ELAINE ALLEN, did commit the  
21 following overt acts:

22 1. On or about May 18, 2013, within the Eastern District of Washington,  
23 Defendant ANTHONY D. RAMIL did, with the intent to defraud, pass a counterfeit \$20  
24 Federal Reserve Note, bearing serial number IJ76840885A, which ANTHONY D.  
25 RAMIL knew to be counterfeit, at the Rosauers Supermarket located at 2610 E. 29th  
26 Ave., Spokane, Washington.

27 2. On or about June 7, 2013, within the Eastern District of Washington,  
28 Defendants GERALD W. TARMAN, TERESA LOUISE ALLEN, and BRIENNA

ELAINE ALLEN did, with the intent to defraud, pass four (4) counterfeit \$20 Federal Reserve Notes, bearing serial number IG79572673C, which GERALD W. TARMAN, TERESA LOUISE ALLEN, and BRIENNA ELAINE ALLEN knew to be counterfeit, at the Walgreens located at 1708 W. Northwest Blvd., Spokane, Washington.

3. On or about June 8, 2013, within the Eastern District of Washington, Defendants ANTHONY DANIEL RAMIL, GERALD W. TARMAN, TERESA LOUISE ALLEN and BRIENNA ELAINE ALLEN did, with the intent to defraud, pass two (2) counterfeit \$20 Federal Reserve Notes, bearing serial number IB35993511B, which ANTHONY DANIEL RAMIL, GERALD W. TARMAN, TERESA LOUISE ALLEN, and BRIENNA ELAINE ALLEN, knew to be counterfeit, at Ace Hardware located at 1330 N. Argonne Road, Spokane Valley, Washington.

4. On or about July 3, 2013, within the Eastern District of Washington, Defendant ANTHONY DANIEL RAMIL did, with the intent to defraud, pass four (4) counterfeit \$20 Federal Reserve Notes, bearing serial number IA57580177A, which ANTHONY D. RAMIL knew to be counterfeit, to Travis Martin in exchange for a HP printer, in Spokane, Washington.

### **COUNT 2**

On or about May 18, 2013, within the Eastern District of Washington, Defendant ANTHONY DANIEL RAMIL did, with the intent to defraud, pass a falsely made, forged and counterfeit \$20 Federal Reserve Note, bearing serial number IJ76840885A, which ANTHONY DANIEL RAMIL knew to be falsely made, forged, and counterfeit, at the Rosauers Supermarket located at 2610 E. 29th Ave., Spokane, Washington, in violation of 18 U.S.C. §§ 472 and 2.

### **COUNT 3**

On or about June 7, 2013, within the Eastern District of Washington, Defendants GERALD W. TARMAN, TERESA LOUISE ALLEN, and BRIENNA ELAINE ALLEN did, with the intent to defraud, pass four (4) falsely made, forged, and counterfeit \$20 Federal Reserve Notes, bearing serial number IG79572673C, which GERALD W.

TARMAN, TERESA LOUISE ALLEN, and BRIENNA ELAINE ALLEN knew to be falsely made, forged, and counterfeit, at the Walgreens located at 1708 W. Northwest Blvd., Spokane, Washington, , in violation of 18 U.S.C. §§ 472 and 2.

#### **COUNT 4**

On or about June 8, 2013, within the Eastern District of Washington, Defendants ANTHONY DANIEL RAMIL, GERALD W. TARMAN, TERESA LOUISE ALLEN and BRIENNA ELAINE ALLEN did, with the intent to defraud, pass two (2) falsely made, forged, and counterfeit \$20 Federal Reserve Notes, bearing serial number IB35993511B, which ANTHONY DANIEL RAMIL, GERALD W. TARMAN, TERESA LOUISE ALLEN, and BRIENNA ELAINE ALLEN, knew to be falsely made, forged, and counterfeit, at Ace Hardware located at 1330 N. Argonne Road, Spokane Valley, Washington, in violation of 18 U.S.C. §§ 472 and 2.

#### **COUNT 5**

On or about July 3, 2013, within the Eastern District of Washington, Defendant ANTHONY DANIEL RAMIL did, with the intent to defraud, pass four (4) falsely made, forged, and counterfeit \$20 Federal Reserve Notes, bearing serial number IA57580177A, which ANTHONY DANIEL RAMIL knew to be falsely made, forged, and counterfeit, to Travis Martin in exchange for a HP printer, in Spokane, Washington, in violation of 18 U.S.C. §§ 472 and 2.

#### **COUNT 6**

That on an exact date unknown, but no later than on or about May 21, 2013, and continuing until on or about July 12, 2013, in the Eastern District of Washington, the Defendants, ANTHONY DANIEL RAMIL, GERALD W. TARMAN, TERESA LOUISE ALLEN, and BRIENNA ELAINE ALLEN, and others both known and unknown to the Grand Jury, with the intent to defraud, did knowingly falsely make and manufacture counterfeit obligations of the United States, specifically counterfeit Federal Reserve Notes in \$20 denominations bearing the serial numbers: IJ76840885A,

1 IG79572673C, IB35993511B, JA76941548A, IF05286193A, JB85311121C,  
2 IF79356791H, ID06588228D, IA57580177A, and JL69678393C, in violation of 18  
3 U.S.C. §§ 471 and 2.

4 **NOTICE OF FORFEITURE ALLEGATIONS**

5 The allegations contained in Counts 1-6 of the Indictment are hereby re-alleged  
6 and incorporated herein by this reference for the purpose of alleging forfeitures pursuant  
7 to 18 U.S.C. § 982(a)(2).

8 Upon conviction of any of the offenses in Counts 1-6, in violation of 18 U.S.C.  
9 §§ 371, 471, and 472, Defendants ANTHONY DANIEL RAMIL, GERALD W.  
10 TARMAN, TERESA LOUISE ALLEN, and BRIENNA ELAINE ALLEN shall forfeit to  
11 the United States, pursuant to 18 U.S.C. § 982(a)(2), any property, real or personal,  
12 which constitutes or is derived from proceeds traceable to the offenses. The property to  
13 be forfeited includes, but is not limited to, the following: a money judgment, vehicles,  
14 and real property.

15 If any of the property described above, as a result of any act or omission of any of  
16 the Defendant:

- 17 (a) cannot be located upon the exercise of due diligence;  
18 (b) has been transferred or sold to, or deposited with, a third party;  
19 (c) has been placed beyond the jurisdiction of the court;  
20 (d) has been substantially diminished in value; or  
21 (e) has been commingled with other property which cannot be divided without  
22 difficulty;

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26 /////

the United States shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. 982(b)(1) and 28 U.S.C. § 2461(c). All pursuant to 18 U.S.C. § 981(a)(2)(A) and 28 U.S.C. § 2461(c).

Dated this 21<sup>st</sup> day of January 2015.

A TRUE BILL

  
MICHAEL C. ORMSBY  
UNITED STATES ATTORNEY

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Aine Ahmed  
Assistant United States Attorney